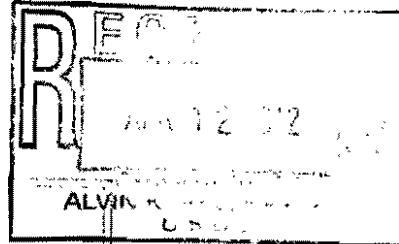
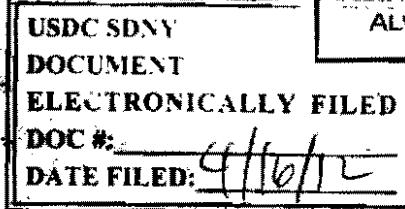


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April 10, 2012

Honorable Alvin K. Hellerstein  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, N.Y. 10007



**Re: *United States v. Paul Cabrera*  
Indictment No. 12 Cr. 252 (AKH)**

Dear Judge Hellerstein,

I write on behalf of the defendant, Paul Cabrera in the above-referenced case, which is currently scheduled for sentencing on July 13, 2012. Your Honor accepted the defendant's guilty plea to forcibly impeding a law enforcement officer on March 27, 2012. The purpose of this letter is to request a partial modification of Mr. Cabrera's bail conditions.

Mr. Cabrera is at presently at liberty on a \$100,000 appearance bond secured by \$3,000.00 cash and co-signed by two financially responsible persons. He is subject to home confinement enforced by electronic monitoring but is permitted to maintain full time employment in the construction industry and to attend weekend church services. He has been a model of compliance for the past 10 months. We request, respectfully, that the home confinement component be lifted, or in the alternative, that it be down graded to a court specified-curfew, such as a requirement that Mr. Cabrera be at home from 12:00 midnight to 6:00 a.m.

The modification will enable Mr. Cabrera to begin a long stretch of voluntary community service at the New Tabernacle Baptist Church, located at 990 East 181<sup>st</sup> Street in The Bronx. As a carpenter and decades long member of Local 157, Mr. Cabrera is able to perform much needed flooring, painting and plastering work in the

*To address w/out objection  
4/16/12  
Bruce K. Kaye*

**Hon. Alvin K. Hellerstein**  
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Church basement, where parishioners dine, screen movies and dispense food to the poor on Saturdays. I am informed by Rev. Ratliss that the church building was erected in 1905 and that there is no shortage of renovations to perform, in addition to the basement work.

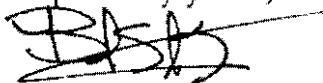
Mr. Cabrera estimates that the work will require approximately 120 hours of his time, which will have to be accomplished concurrently with his employment and childcare responsibilities. Current bail conditions require pre-approval for any detour or deviation, which will hamper the progress of the renovation to the detriment of both the Church and the defendant.

Reverend Ratliss has provided me with his cell phone number and is expressly available at the court's convenience if there are questions or concerns that I have not properly addressed in this letter.

Mr. Cabrera has sincere feelings of regret for misdirecting his anger towards the Assistant United States Attorney and he wishes to begin to make amends by performing this work for the church in which he was baptized - nearly 50 years ago. I have seen photographs of the basement area and I can confidently represent that both the church and the defendant will benefit from the proposed arrangement. We are hopeful that the court will allow it to take place by either lifting the home confinement component entirely or by down grading this condition to a court specified-curfew.

I have discussed this request with Special AUSA Thomas J. Eicher and Pre-trial services officer Dennis Khilkevich, and they do not object to either requested modification.

Respectfully yours,



Bruce K. Kaye  
Attorney for Paul Cabrera

cc: AUSA Thomas J. Eicher - Tel. 973-353-6092  
USPO Dennis Khilkevich - Tel. 212-805-4147